

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

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STEVE MILLER,

Plaintiff,

-against-

KEVIN M. FLYNN, FLYNN ASSOCIATES
MANAGEMENT CORPORATION, MICHAEL
FLYNN, JOSEPH FLANNIGAN, LEV
FEDYNIAK, PAT OSLER, JOHN G. CLARK,
JR., M.D., BOSTON DEVELOPMENT
INSTITUTE, EDWARD WALTERS, JACK
CHANCELLOR, PAULETTE COOPER and
BRUCE HOENIG,

Defendants.
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: Civil Action
No. 81 4275-FW

Deposition of JOSEPH M. FLANAGAN,

taken by the Plaintiff, pursuant to notice,

at 42 West 44th Street, New York, New York

10036, on Thursday, April 22, 1982, at

10:00 o'clock in the forenoon, before

William Davis, a Certified Shorthand

Reporter and a Notary Public within and for

the State of New York.

NEWROCK REPORTING SERVICE
WILLIAM NEWROCK, CSR

35 West 44th Street
New York, N.Y. 10036

(212) 840-1881

going back and forth between yourself and Kevin Flynn?

A I don't, I don't recall anything, no.

Q Is it a fair statement to say that with the exception of these meetings, most of your contact with Kevin Flynn is done via the telephone?

A That would be fair.

Q And since you first became acquainted with Kevin Flynn, can you estimate the amount of telephone contact you have had with him?

Is it on a weekly basis, a monthly basis? What is your best estimate?

A Maybe about 30 times.

Calling Boston is expensive, so I try to keep th to a minimum.

Q Did Kevin Flynn pay you directly for your services in the Steve Miller deprogramming?

A He paid -- reviewing the records there, when he has paid me he has always paid me by check, so, yes, he would have paid me directly.

Q What I am asking is whether you received your payment from Kevin as opposed to from some other person.

A Oh, no, it would have been from Kevin.

Q Have you ever received payment for

1
2 deprogramming services directly from the family or
3 was it always through Kevin?

4 A You know, from families and from Kevin.

5 MR. LEVINE: Well, wait. I think your
6 question is a little unclear.

7 First of all, the question itself
8 assumes that every deprogramming he has ever
9 done he has done with Kevin.

10 You are talking about those situations
11 where he is involved with Kevin in a
12 deprogramming situation, does he always receive
13 payment from Kevin.

14 MR. RANDOLPH: Of course

15 Q If Kevin isn't involved in a situation
16 I assume you don't receive payment from him.

17 A Correct.

18 I was a little confused about that myself.

19 Could I add something else?

20 Q Yes.

21 A There was one situation where I was not paid
22 directly by Kevin, Tarraba. The boy's name was
23 Eddie Tarraba.

24 Q That was a situation in which Kevin Flynn
25 was involved, but nonetheless you were not paid by

1

2

Kevin Flynn; is that correct?

3

A That's correct.

4

Q Is that the only one that falls in that

5

category that you can recall?

6

A That would be the only one.

7

Q Generally if Kevin isn't involved, then

8

he has no place in the chain of passage of money,

9

correct?

10

A Correct.

11

Q And if he is involved, then he is

12

generally the one who disburses the money; is that

13

correct?

14

A That's correct.

15

Q And can you estimate the number of times

16

you have been paid by Kevin Flynn for deprogramming

17

associated activities?

18

MR. LEVINE: Let me confer with him for a

19

moment.

20

(Consultation between the witness

21

and Mr. Levine.)

22

Q Have you had an opportunity to confer

23

with your counsel?

24

A Oh, yes.

25

Q All right.

1 I know that I have written up some either quick
2 statements or taken time to write out statements. If
3 I can track it down I can get copies for you.

4 Q I was going to ask for copies.

5 A Yes. The overwhelming number of them, I would
6 just type it up and that was that.

7 Q And would you make a copy?

8 A If I could get to a library to photostat or
9 something like that.

10 Q And you will look at your records to
11 see if you have any of those?

12 A Yes.

13 Q In the Miller case did you present
14 written statements of your expenses to Kevin Flynn?

15 A I am not sure. I think Kevin, Kevin was
16 handling the money on that and he covered most of
17 the expenses, but I think I did have expenses
18 above and beyond and I may have written up a
19 statement. In something like that it strikes me
20 that I would have kept a copy since we were sort of
21 dealing with a third party.

22 Q Do you have any recollection of having
23 done so?

24 A No, but I could certainly check that out for you.